

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
	ECF Case

This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN)  
Ashton, et al. v. Kingdom of Saudi Arabia, 17-cv-02003 (GBD)(SN)

**DECLARATION OF ATTORNEY SANDRA M. KELLY, IN SUPPORT OF  
APPLICATION TO SUBSTITUTE COUNSEL**

Sandra M. Kelly, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury under the laws of the United States of America, that the following is true and correct:

1. I am an attorney admitted to practice before this Court. I submit this Declaration in support of a consent application (Local Rule 1.4) to substitute my law firm, Ray Robinson Law Co., LPA, in the place and stead of Kreindler & Kreindler LLP, on behalf of Dae Jin Ryook individually and as Administrator of the Estate of Christina S. Ryook, Deceased, and all survivors of Christina S. Ryook. I am personally familiar and attest to the truth of the facts that follow below.

2. This MDL litigation is ongoing, and it is being handled by a Plaintiffs' Executive Committee, so there will be no prejudice to the Plaintiffs, or the Defendants, by the requested substitution of the Plaintiff's original counsel.

3. The attached "Consent" shows that these Plaintiffs, their outgoing attorney (Megan Bennett), and their incoming attorney (Sandra M. Kelly), consent to the substitution.

4. In light of Plaintiff, Dae Jin Ryook's wishes, and their attorneys' consent, I respectfully request that this substitution be completed without delay, by the court "so-ordering" the attached "Consent."

Dated: 4/15/2024

I declare under penalty of perjury under the laws of the United States of American  
that the foregoing is true and correct.

/s/ Sandra M. Kelly (0037008)

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